

MAZIE SLATER KATZ & FREEMAN, LLC

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Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

XAVIER INGRAM,

Plaintiff,

vs.

COUNTY OF CAMDEN, CAMDEN COUNTY
POLICE DEPARTMENT,
JEREMY MERCK, ANTONIO
GENNETTA, NICHOLAS MARCHIAFAVA,
JOHN SCOTT THOMSON, ORLANDO
CUEVAS, JOHN DOE(S) 1-50, and
ABC ENTITIES 1-10,

Defendants.

CIVIL ACTION NO. 1:14-CV-05519

**DOCUMENT IDENTIFYING
CERTIFICATION OF BETH G.
BALDINGER**

Beth G. Baldinger, of full age, hereby certifies that I am an attorney at law of the State of New Jersey and a partner in the law firm of Mazie Slater Katz & Freeman, LLC, attorneys for the plaintiff and am fully familiar with the facts and circumstances of this action. I submit this Document Identifying Certification with exhibits annexed hereto as referenced in my Certification in support of Plaintiff's Motion to Enforce Settlement. Each of the documents referenced below and attached herewith are true and accurate copies of the originals.

1. Exhibit A: E-mail of May 6, 2022 from Magistrate Judge Pamela Carlos.
2. Exhibit B: E-mails of May 6, 2022 from William Tambussi, Esq. and Beth Baldinger, Esq.

3. Exhibit C: E-mails of May 12, 2022 from Beth Baldinger and William Cook; and E-mail of May 16, 2022 from William Cook.

4. Exhibit D: E-mail of May 18, 2022 from Beth Baldinger with attachments: Charles Jones Report of May 6, 2022 and Medicaid Lien letter of March 14, 2022; and E-mail of May 19, 2022 from William Cook.

5. Exhibit E: E-mail of May 23, 2022 from Beth Baldinger with attachments: May 23, 2022 opinion letter from Thomas D. Begley, Jr., Esq., the December 15, 2021 Letter from Beth Baldinger to Medicare for lien information and the January 21, 2022 letter from CMS verifying that Mr. Ingram is not in Medicare's system; and the May 23, 2022 E-mail from William Cook.

6. Exhibit F: E-mail of May 25, 2022 from Beth Baldinger and E-Mail of May 25, 2022 from William Cook.

7. Exhibit G: E-mail of May 25, 2022 at 9:24 pm from William Cook with attachment: Proposed General Release dated May 25, 2022.

8. Exhibit H: E-mail of May 26, 2022 from William Cook.

9. Exhibit I: E-mails of June 1, 2022 from William Cook.

10. Exhibit J: Letter of June 1, 2022 from Beth Baldinger to William Tambussi, William Cook and all counsel.

11. Exhibit K: E-mail of June 2, 2022 from William Cook with attached Revised General Release dated June 2, 2022; Email of June 3, 2022 from Beth Baldinger.

12. Exhibit L: Letter of June 3, 2022 from Cory Rothbort, Esq. with attachments including June 2, 2022 letter to NGHP (for CMS) referencing attached 12/15/21 letter and

1/21/22 letter from CMS; and signed authorization to Nationwide for release of Medicaid information.

13. Exhibit M: E-mail of June 7, 2022 from Beth Baldinger with Redlined version of the defendants' proposed General Release dated June 2, 2022.

14. Exhibit N: Letter dated June 15, 2022 from Beth Baldinger to Magistrate Judge Pamela Carlos along with Plaintiff's draft version of the Settlement Agreement; Opinion letter from Thomas D. Begley, Jr., Esq. and Redacted Release in another case recently settled for \$13 million dollars.

15. Exhibit O: Letter of June 15, 2022 from William Cook to Magistrate Judge Pamela Carlos and Settlement Agreement dated June 2, 2022 at 9:02 pm.

16. Exhibit P: Plaintiff's proposed General Release.

17. Exhibit Q: Release entered in Zhong v. New Jersey Transit Corp. for \$10 million on June 15, 2022.

18. Exhibit R: Release entered in confidential case for \$13 million on March 23, 2022.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Beth G. Baldinger
BETH G. BALDINGER

Dated: June 23, 2022